

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|----------------------------------|---|----------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. 18 CR 743-4 |
| |) | |
| YOSHIMI HENRY, |) | The Honorable |
| |) | John Robert Blakey, |
| Defendant. |) | Presiding Judge |

**EMERGENCY UNOPPOSED MOTION
TO MODIFY CONDITIONS OF RELEASE**

Now comes the defendant, YOSHIMI HENRY, by and through her attorney, GREGG L. SMITH, and respectfully moves this Honorable Court to modify the conditions of her pretrial release. In support of this motion, the Defendant states as follows:

1. On November 1, 2018, Ms. Henry was charged in an Indictment with wire fraud, in violation of 18 U.S.C. § 1343.
2. Ms. Henry made her initial appearance on November 13, 2018, and was released on her own recognizance. (Dkt. Nos. 27 and 28)
3. On December 13, 2018, a Superseding Indictment was returned. (Dkt. No. 62)
4. On June 23, 2023, Ms. Henry pled guilty to Count 8 of the Superseding Indictment pursuant to a written Plea Agreement, which this Court accepted. (Dkt. Nos. 510 and 511) Sentencing is currently scheduled for February 14, 2024. (Dkt. No. 532)
3. Yoshimi Henry is requesting movement to travel to Dartmouth College in Hanover, New Hampshire between December 1, 2023 through December 7, 2023. Ms. Henry was accepted by the Tuck School of Business, the graduate business school at Dartmouth College, to participate

in a program entitled Building a Successful Diverse Business. The graduate school program will be held December 2 through December 7, 2023, at Dartmouth College. Ms. Henry will be staying at the Hanover Inn Dartmouth, 2 E. Wheelock Street, Hanover, New Hampshire 03755.

5. Ms. Henry has complied with all conditions of her bond.

6. Defense counsel has contacted the prosecutor in this matter and they do not oppose this request.

WHEREFORE, the Defendant moves this Honorable Court to modify his conditions of pretrial release.

Respectfully submitted,

/s/ Gregg L. Smith

Gregg L. Smith

Attorney for Yoshimi Henry

Gregg L. Smith
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Suite 1700
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CERTIFICATE OF SERVICE

I, Gregg L. Smith, the attorney for Defendant Yoshimi Henry, hereby certify that I filed the above-described document on the CM-ECF system of the United States District Court for the Northern District of Illinois, which constitutes service of the same.

Respectfully submitted,

/s/ Gregg L. Smith

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Attorney for Yoshimi Henry

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